

Mr. James Frase
3100 North Detroit Street
P.O. Box 137
Warsaw, In 46158-0137

Re: 085-16150
First Significant Permit Modification to
Part 70 No.: T 085-7919-00002

Dear Mr. Frase:

Da-Lite Screen Company, Inc. was issued a permit on September 5, 2002 for a photographic equipment and supplies operation. A letter requesting changes to this permit was received on September 24, 2002. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changes to the descriptions of facilities located in D.1-D.6 and A.2. The modification also includes removing the existing surface coating monitoring conditions located in D.2 through D.5. A new trainer operator program condition has been added under each respective Compliance Determination section.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nysa L. James, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Nysa L. James or extension (3-6875), or dial (317) 233-6875.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

NLJ

cc: File - Kosciusko County
U.S. EPA, Region V
Kosciusko County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Da-Lite Screen Company, Inc
3100 North Detroit Street
Warsaw, Indiana**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T085-7919-00002	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: September 5, 2002 Expiration Date: September 5, 2007
First Significant Permit Modification No: T085-16150	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 22, 2003

C.10 Compliance Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.12 Monitoring Methods [326 IAC 3]
- C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5][326 IAC 2-7-6]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]
- C.21 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e) and 326 IAC 2-7-12]

Stratospheric Ozone Protection

- C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - Boilers

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Particulate Matter (PM) [326 IAC 6-2]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.2 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS - Metals Coating Operations

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.2.1 Particulate Matter (PM) [40 CFR 52, Subpart P]
- D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.2.3 Operator Training Program
- D.2.4 Particulate [326 IAC 6-3-2(d)]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.2.5 Record Keeping Requirements

D.3 FACILITY OPERATION CONDITIONS - Metal Coating Operations

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.3.1 Particulate Matter (PM) [40 CFR 52, Subpart P]
- D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]
- D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.3.4 Operator Training Program

D.3.5 Particulate [326 IAC 6-3-2(d)]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.6 Record Keeping Requirements

D.4 FACILITY OPERATION CONDITIONS - Spray Fabric Operations

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [40 CFR 52, Subpart P]

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.4.4 VOC Emissions

Compliance Determination Requirements

D.4.5 Operator Training Program

D.4.6 Particulate [326 IAC 6-3-2(d)]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.7 Record Keeping Requirements

D.4.8 Reporting Requirements

D.5 FACILITY OPERATION CONDITIONS - Coating Wood Operation

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Matter (PM) [40 CFR 52, Subpart P]

D.5.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

D.5.3 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

D.5.4 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

D.5.5 Wood Furniture NESHAP [40 CFR 63, Subpart JJ][326 IAC 20-14-1]

D.5.6 Work Practice Standards [40 CFR 63.803][326 IAC 20-14-1]

Compliance Determination Requirements

D.5.7 VOC Emissions

D.5.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [40 CFR 63]

D.5.9 Operator Training Program

D.5.10 Particulate [326 IAC 6-3-2(d)]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.11 Record Keeping Requirements

D.5.12 Reporting Requirements

D.6 FACILITY OPERATION CONDITIONS - Woodworking

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Particulate Matter (PM) [326 40 CFR 52, Subpart P]

D.6.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.3 Particulate [326 IAC 6-3-2(d)]

D.6.4 Visible Emissions Notations

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a photographic equipment and supplies operation.

Responsible Official: Al Khatibi
Source Address: 3100 North Detroit Street
Mailing Address: P.O. Box 137, Warsaw, IN 46581-0137
Phone Number: (574) 267-8101
SIC Code: 3861 and 2521
County Location: Kosciusko
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Existing Source, under PSD,
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) boiler, identified as P1, combusting only natural gas, with a maximum heat input rate of 10.35 MMBtu/hr, exhausting at stack S1, installed in 1968.
- (b) One (1) boiler, model OLO98989, identified as P13, combusting natural gas, with a maximum heat input rate of 16.75 MMBtu/hr, exhausting at stack S49, installed in 1999. (Note: It was exempted from pre-construction permit because of low emission level)
- (c) One (1) Conveyorized Paint line consisting of three (3) Ranzburg spray booths, identified as P2, coating metal parts, application methods are electrostatic disk, HVLP and electrostatic air atomized, with a maximum usage of 2.41 gallons per minute, using dry filters as control, and exhausting at stacks S2, S3, S4, S5, S6, S7, S8, S9, S10, and S11, installed in 1968.
- (d) One (1) Cosmo/Model C booth, identified as P3, coating metal parts, using air atomization or HVLP application method, with a maximum usage of 0.94 gallons per minute, using dry filters as control, and exhausting at stack S15, installed in 1968. (Note: One paint booth with 2 spray guns; referred as the Cosmo/Model C booth).
- (e) One (1) glass beading operation with a built-in curing UV-oven (GLBD), identified as P4, with a maximum capacity of 750 pounds of glass beads and 22 pounds of nonvolatile adhesive to be coated on a maximum 500 yards of fabric per hour, exhausting to a stack identified as S48, installed in 1998.
- (f) Two (2) spray booths, East and West Hand Spray Booths, each with two spray guns, identified as P3a, coating metal parts, using HVLP method, with a maximum usage of 1.69 gallons per minute, using dry filters as control, and exhausting at stacks S12, S13

and S14, installed in 1986.

- (g) One (1) Screen Assembly West Spray Table 1, (ST₁)*, identified as P6**, coating screen fabric, application method is HVLP, with a maximum capacity of 24 fabric screens per hour, using dry filters as control, and exhausting at stacks S20 and S21, installed in 1968.
(Note:*ST stands for Spray Table for coating screen fabric and there are 8 spray tables, each is numbered as 1 through 8 and they are listed from g through n.
**All Spray Tables 1 through 8 are identified as P6, this identification is to represent the identification used in the annual emission report.)
- (h) One (1) Customs' West Spray Table 3, (ST₃), identified as P6, coating screen fabric, application method is HVLP, with a maximum capacity of 12 fabric screens per hour, using dry filters as control, and exhausting at stacks, S22 and S23, Installed in 1968.
- (i) One (1) East Tension Tab Screen Spray Table, (ST₄), identified as P6, application method is HVLP, coating fabric screens with a maximum capacity of 12 fabric screens per hour, equipped with a dry filter for particulate over spray control and exhausting to stacks S24 and S25, installed in 1996.
(Note: This is ST₄ shown in 1996 company application, and it's exhausts to stack S24 & S25 not S27 & S28 as shown in CP 085-6342.)
- (j) One (1) Custom East Spray Table, (ST₅) identified as P6, equipped with HVLP, with a maximum capacity of 12 fabric screens per hour, using dry filters for particulate control and exhausting at stack identified as S40 and S41, installed 1997.
- (k) One (1) Screen Assembly East Spray Table, (ST₂), identified as P6, equipped with HVLP, with a maximum capacity of 24 fabric screens per hour, using a dry filter for overspray control, and exhausting at stacks identified as S46 and S47. (This unit was constructed in 1994 and use to share emission stacks S20 and S21 with unit ST₁. After receiving CP-085-9873-00002 on October 23, 1998, this unit was relocated to have its own Stacks S46 and S47)
- (l) One (1) Screen Assembly Small Spray Table, ST₆, identified as P6, equipped with HVLP, with a maximum capacity of 15 fabric screens per hour, using a dry filter for overspray control, and exhausting at stacks identified as S42 and S43, installed in 1998.
(Note: ST₆, S42 and S43 were relocated in 2000)
- (m) One (1) West Tension Tab Screen Spray Table, (ST₇), identified as P6, equipped with HVLP, with a maximum capacity of 12 fabric screens per hour, using a dry filter for overspray control, and exhausting at stacks identified as S44 and S45, installed in 1998.
- (n) One (1) New Tension Tab Screen Spray (ST₈), identified as P6, with a maximum capacity of 12 fabric screens per hour, equipped with HVLP Spray Applicator and dry filters for particulate control and exhausting to stacks S50 and S51. SSM 085-12975-00002 was issued on March 15, 2001.
(Note: Next year the emission report at ID point P6 will represent 8 spray tables of item g through n)
- (o) One (1) coater, 100" coater, identified as P7, coating screen cloth, application method is flow coating, with a maximum capacity of 1.2 units per hour, and exhausting at stacks S26, S27, S28, S29 and S30, installed in 1969.
- (p) Four (4) spray booths consisting of one (1) black paint booth, one (1) south glue booth, one (1) north glue booth, and one (1) finish spray booth and one (1) hand application

operation, identified as P8, coating wood furniture. Application methods are HVLP and hand application, with a maximum usage of 1.41 gallons per minute, using dry filters as control and exhausting at stacks S31, S32, S33, S34, S35 and S36, installed in 1989. (Note: two north and south glue booths are the contact cement booths.)

- (q) Fourteen (14) woodworking machines, identified as P9, utilized for the construction of audio/visual furniture, using a baghouse for control, and exhausting to stack S37, installed in 1989.
- (r) The Box Shop Coating facilities identified as P10, coating wood boxes of medium density fiberboard for building or structural components, applied with paint rollers using a water based paint, with a maximum usage of 0.1 gallons per minute and exhausting at stack S38, installed prior to 1980.
- (s) One (1) CNC router with an internal bagfilter collector and no outside exhaust, install in 1968.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Paved and unpaved roads and parking lots with public access.[326 IAC 6-4](covered under C5.)
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.[326 IAC 6-3] (covered under C.1.)
- (c) Dye (Metal) Maintenance Shop: Grinders, Lathes, and Drill Presses [326 IAC 6-3-2](covered under C.1)
- (d) Two (2) Tungsten Inert Gas Welding stations, 48 pounds of electrode used each day. [326 IAC 6-3] (covered under C.1.)
- (e) Silk Screening, identified as Pb Spray Table 2, (4 quarts used in 1995) - Maximum Use Under 3 pounds/hours VOCs or 15 pounds/day VOCs [6-3-2](covered under C.1)
- (f) One (1) Controlled Pyrolysis Furnace, which is an incinerator used to remove paint from conveyor hooks and parts [326 IAC 4-2](covered under C.4).

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because..

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) Conveyorized Paint line consisting of three (3) Ranzburg spray booths, identified as P2 , coating metal parts, application methods are electrostatic disk, HVLP and electrostatic air atomized, with a maximum usage of 2.41 gallons per minute, using dry filters as control, and exhausting at stacks S2, S3, S4, S5, S6, S7, S8, S9, S10, and S11, installed in 1968.
- (b) One (1) Cosmo/Model C booth, identified as P3, coating metal parts, using air atomization or HVLP application method, with a maximum usage of 0.94 gallons per minute, using dry filters as control, and exhausting at stack S15, installed in 1968.
(Note: One paint booth with 2 spray guns; referred as the Cosmo/Model C booth).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the three (3) Ranzburg spray booths and Cosmo/Model C booth shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.2.3 Operator Training Program

- (a) The Permittee shall demonstrate compliance with 326 IAC 6-3 by the implementation of an operator-training program as follows:
 - (1) All operators that perform surface coating operations using spray equipment or booth maintenance, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.

- (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.2.4 Particulate [326 IAC 6-3-2(d)]

The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the Ranzburg spray booths and the Cosmo/Model C booth are in operation. The requirement to operate the control is not federally enforceable.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.5 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1 and D.2.3, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Two (2) spray booths, East and West Hand Spray Booths, each with two spray guns, identified as P3a, coating metal parts, HVLP method, with a maximum usage of 1.69 gallons per minute, using dry filters as control, and exhausting at stacks S12, S13 and S14, installed in 1986.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52, Subpart P, the PM from the East and West Hand Spray booths, identified as P3a, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Any change or modification which may increase the potential VOC emissions to greater than 25 tons per year per facility shall require prior approval from the Office of Air Quality.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.4 Operator Training Program

- (a) The Permittee shall demonstrate compliance with 326 IAC 6-3 by the implementation of an operator-training program as follows:
 - (1) All operators that perform surface coating operations using spray equipment or booth maintenance, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.
 - (3) All operators shall be given refresher training annually.

- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.3.5 Particulate [326 IAC 6-3-2(d)]

The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the spray booths are in operation. The requirement to operate the control is not federally enforceable.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.6 Record Keeping Requirements

- (a) To document compliance with Condition D.3.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.2.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents
 - (2) A log of the dates of use
 - (3) The volume weighted VOC content of the coatings used for each month
 - (4) The cleanup solvent usage for each month
 - (5) The total VOC usage for each month and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.3.1 and D.3.4, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (d) One (1) Screen Assembly West Spray Table 1, (ST₁)*, identified as P6**, coating screen fabric, application method is HVLP, with a maximum capacity of 24 fabric screens per hour, using dry filters as control, and exhausting at stacks S20 and S21, installed in 1968.
(Note:*ST stands for Spray Table for coating screen fabric and there are 8 spray tables, each is numbered as 1 through 8 and they are listed from d through k.
**All Spray Tables 1 through 8 are identified as P6, this identification is to represent the identification used in the annual emission report.)
- (e) One (1) Customs' West Spray Table 3, (ST₃), identified as P6, coating screen fabric, application method is HVLP, with a maximum capacity of 12 fabric screens per hour, using dry filters as control, and exhausting at stacks, S22 and S23, Installed in 1968.
- (f) One (1) East Tension Tab Screen Spray Table, (ST₄), identified as P6, application method is HVLP, coating fabric screens with a maximum capacity of 12 fabric screens per hour, equipped with a dry filter for particulate over spray control and exhausting to stacks S24 and S25, installed in 1996.
(Note: This is ST₄ shown in 1996 company application, and it's exhausts to stack S24 & S25 not S27 & S28 as shown in CP 085-6342.)
- (g) One (1) Custom East Spray Table, (ST₅) identified as P6, equipped with HVLP, with a maximum capacity of 12 fabric screens per hour, using dry filters for particulate control and exhausting at stack identified as S40 and S41, installed 1997.
- (h) One (1) Screen Assembly East Spray Table, (ST₂), identified as P6, equipped with HVLP, with a maximum capacity of 24 fabric screens per hour, using a dry filter for overspray control, and exhausting at stacks identified as S46 and S47. (This unit was constructed in 1994 and use to share emission stacks S20 and S21 with unit ST₁. After receiving CP-085-9873-00002 on October 23, 1998, this unit was relocated to have its own Stacks S46 and S47)
- (i) One (1) Screen Assembly Small Spray Table, ST₆, identified as P6, equipped with HVLP, with a maximum capacity of 15 fabric screens per hour, using a dry filter for overspray control, and exhausting at stacks identified as S42 and S43, installed in 1998.
(Note: ST₆, S42 and S43 were relocated in 2000)
- (j) One (1) West Tension Tab Screen Spray Table, (ST₇), identified as P6, equipped with HVLP, with a maximum capacity of 12 fabric screens per hour, using a dry filter for overspray control, and exhausting at stacks identified as S44 and S45, installed in 1998.
- (k) One (1) New Tension Tab Screen Spray (ST₈), identified as P6, with a maximum capacity of 12 fabric screens per hour, equipped with HVLP Spray Applicator and dry filters for particulate control and exhausting to stacks S50 and S51. SSM 085-12975-00002 was issued on March 15, 2001.
(Note: Next year the emission report at ID point P6 will represent 8 spray tables of item g through n)
- (l) One (1) glass beading operation with a built-in curing UV-oven (GLBD), identified as P4, with a maximum capacity of 750 pounds of glass beads and 22 pounds of nonvolatile adhesive to be coated on a maximum 500 yards of fabric per hour, exhausting to a stack identified as S48, installed in 1998.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1. Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52, Subpart P and CP 085-9873-0002 issued on October 23, 1998, the PM from each of the paint tables; ST₁, ST₂, ST₃, ST₄, ST₅, ST₆, ST₇, ST₈ and GLBD shall not exceed the pounds per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) Pursuant to CP 085-6342-00002 issued on January 16, 1997, the Spray Table 4 shall use less than 25 tons of VOC per twelve (12) consecutive month period, where compliance is determined at the end of each month. This is equivalent to less than 25 tons per year of VOC emission. Compliance with this limit makes 326 IAC 8-1-6 (New facilities; general reduction requirements) not applicable.
- (b) Pursuant to SSM 085-12975-00002, issued on March 15, 2001, New Tension Tab Screen Spray (ST₈) shall use less than 25 tons of VOC per twelve (12) consecutive month period, where compliance is determined at the end of each month. This is equivalent to less than 25 tons per year of VOC emission. Compliance with this limit makes 326 IAC 8-1-6 (New facilities; general reduction requirements) not applicable.

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.4.4 VOC Emissions

Compliance with Condition D.4.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the month.

D.4.5 Operator Training Program

- (a) The Permittee shall demonstrate compliance with 326 IAC 6-3 by the implementation of an operator-training program as follows:
 - (1) All operators that perform surface coating operations using spray equipment or booth maintenance, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.
 - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the

Preventive Maintenance Plan.

D.4.6 Particulate [326 IAC 6-3-2(d)]

The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when ST₁, ST₃, ST₄, ST₅, and ST₈, ST₂, ST₆, ST₇, and GLBD are in operation. The requirement to operate the control is not federally enforceable.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.7 Record Keeping Requirements

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- (a) To document compliance with Conditions D.4.2 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use
 - (3) The volume weighted VOC content of the coatings used for each month
 - (4) The cleanup solvent usage for each month
 - (5) The total VOC usage for each month and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.4.1 and D.4.5, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter period being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Four (4) spray booths consisting of one (1) black paint booth, one (1) south glue booth, one (1) north glue booth, and one (1) finish spray booth and one (1) hand application operation, identified as P8, coating wood furniture. Application methods are HVLP and hand application, with a maximum usage of 1.41 gallons per minute, using dry filters as control and exhausting at stacks S31, S32, S33, S34, S35 and S36, installed in 1989.

(Note: two north and south glue booths are the contact cement booths.)

The Box Shop Coating facilities identified as P10, coating wood boxes of medium density fiberboard for building or structural components, applied with paint rollers using a water based paint, with a maximum usage of 0.1 gallons per minute and exhausting at stack S38, installed prior to 1980.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52, Subpart P, the PM from the booths, identified as P8, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.5.2 Volatile Organic Compounds (VOC) for Wood Furniture and Cabinet Coating [326 IAC 8-2-12]

The surface coating, identifies as P8, applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.5.3 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP-085-2391-00002, issued on February 17, 1995, the surface coating operation, identified as P8, shall use less than 39 tons per 12 consecutive month period of VOC, including coatings, dilution solvents, and cleaning solvents where compliance is determined at the end of each month. This is equivalent to less than 40 tons per year of VOC emission. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not

applicable.

D.5.4 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

D.5.5 Wood Furniture NESHAP [40 CFR 63, Subpart JJ] [326 IAC 20-14-1]

(a) The wood furniture coating operations are subject to 40 CFR Part 63, subpart JJ, which is incorporated by reference as 326 IAC 20-14-1, with a compliance date of December 7, 1995. Therefore, the wood furniture coating operations, identified as P8, shall comply with the following conditions:

- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
- (2) Limit VHAP emissions contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

D.5.6 Work Practice Standards [40 CFR 63.803][326 IAC 20-14-1]

The Permittee of an affected source subject to this subpart shall continue to maintain a written work practice implementation plan. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.

- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

D.5.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for P8 and P10 and any control devices.

Compliance Determination Requirements

D.5.8 VOC Emissions

Compliance with Condition D.5.3 shall be demonstrated within 30 days of the end of each day based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.5.9 Testing Requirements [326 IAC 2-7-6(1),(6)] [40 CFR 63]

- (c) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.
- (b) IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.5.5 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.5.10 Operator Training Program

- (a) The Permittee shall demonstrate compliance with 326 IAC 6-3 by the implementation of an operator-training program as follows:
 - (1) All operators that perform surface coating operations using spray equipment or booth maintenance, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.
 - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.5.11 Particulate [326 IAC 6-3-2(d)]

The dry filters for particulate matter overspray control shall be properly in place and maintained

to ensure integrity and particulate loading of the filters at all times when the spray booths, identified as P8, are in operation. The requirement to operate the control is not federally enforceable.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.12 Record Keeping Requirements

- (a) To document compliance with Condition D.5.5, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.5.5.
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (b) To document compliance with Conditions D.5.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use
 - (3) The volume weighted VOC content of the coatings used for each month
 - (4) The cleanup solvent usage for each month
 - (5) The total VOC usage for each month and
 - (6) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Condition D.5.6, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (d) To document compliance with Condition D.5.1 and D.5.10, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.12 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.5.3 conditions that require reporting to show compliance shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) An Initial Compliance Report to document compliance with Condition D.5.5 and the Certification form, shall be submitted within sixty (60) days following the compliance date of December 7, 1998. The Initial Compliance Report must include data from the entire month that the compliance date falls. The Initial Compliance Report and the Certification form were submitted on February 18, 2000. The company made amendment to Compliance Status Report and resubmitted the Initial Compliance Report again in February 23, 2000.
- (c) A semi-annual Continuous Compliance Report to document compliance with Condition D.5.5 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

- (1) January 1 through June 30.
- (2) July 1 through December 31.
- (d) The reports required in (b) and (c) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.6

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Fourteen (14) woodworking machines, emission report ID at point P9, utilized for the construction of audio/visual furniture, using a cyclone/baghouse for control, and exhausting at stack S37, installed in 1989.

One (1) router with an internal bagfilter collector and no outside exhaust, install in 1968

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Particulate Matter (PM) [40 CFR Part 52, Subpart P]

Pursuant to 40 CFR Part 52, Subpart P, the allowable PM emission rate from the woodworking facilities including the router, shall not exceed 1.15 pounds per hour when operating at a process weight rate of 300 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.6.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.3 Particulate [326 IAC 6-3-2(d)]

The baghouse for particulate control shall be in operation and control emissions from the woodworking machines including the router at all times that the woodworking machines are in operation. The requirement to operate the control is not federally enforceable.

D.6.4 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking machines' stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name:	Da-Lite Screen Company, Inc.
Source Location:	3100 North Detroit Street, Warsaw, IN 46581
County:	Kosciusko
SIC Code:	3861 and 2521
Operation Permit No.:	085-7919-00002
Operation Permit Issuance Date:	September 5, 2002
Permit Modification No.:	085-16150-00002
Permit Reviewer:	Nysa L. James

On October 10, 2002, the Office of Air Quality (OAQ) had a notice published in the Times Union, Warsaw, Indiana, stating that Da-Lite Screen Company, Inc. had applied for a Part 70 Operating Permit to operate a photographic equipment and supplies operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On October 22, 2002, Da-Lite Screen Company, Inc submitted the following comments:

Comment 1: Da-Lite would like the Responsible Official name change fro James Frase to Al Khatibi.

Response 1: Since this individual meets the criteria as defined in 326 IAC 2-7-1(34), the name is changed as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a photographic equipment and supplies operation.

Responsible Official:	James Frase Al Khatibi
Source Address:	3100 North Detroit Street
Mailing Address:	P.O. Box 137, Warsaw, IN 46581-0137
Phone Number:	(574) 267-8101
SIC Code:	3861 and 2521
County Location:	Kosciusko
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
	Major Existing Source, under PSD,
	Major Source, Section 112 of the Clean Air Act

Comment 2: Section D.4(d) lists the description of the facilities as “g through n”, this should be “d though k” because those are the letters that correspond with the spray tables in that section.

Response 2: The OAQ agrees. The change is as follows:

- (d) One (1) Screen Assembly West Spray Table 1, (ST₁)*, identified as P6**, coating screen fabric, application method is HVLP, with a maximum capacity of 24 fabric screens per hour, using dry filters as control, and exhausting at stacks S20 and S21, installed in 1968.
(Note:*ST stands for Spray Table for coating screen fabric and there are 8 spray tables, each is numbered as 1 through 8 and they are listed from ~~dg~~ through ~~kn~~.
**All Spray Tables 1 through 8 are identified as P6, this identification is to represent the identification used in the annual emission report.)

Comment 3: The description of the "Paint Edger Table *" listed in D.4.2(d) should be labeled as "New Tension Tab Screen Spray Table" in order to be consistent with the description on the page previous.

Response 3: The OAQ agrees. Condition D.4.2(b) is revised as follows:

- (b) Pursuant to SSM 085-12975-00002, issued on March 15, 2001, ~~Paint Edger Table 8~~ **New Tension Tab Screen Spray (ST₈)** shall use less than 25 tons of VOC per twelve (12) consecutive month period, where compliance is determined at the end of each month. This is equivalent to less than 25 tons per year of VOC emission. Compliance with this limit makes 326 IAC 8-1-6 (New facilities; general reduction requirements) not applicable.

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a Significant Permit Modification to
a Part 70 Operating Permit

Source Background and Description

Source Name:	Da-Lite Screen Company, Inc.
Source Location:	3100 North Detroit Street, Warsaw, IN 46581
County:	Kosciusko
SIC Code:	3861 and 2521
Operation Permit No.:	085-7919-00002
Operation Permit Issuance Date:	September 5, 2002
Permit Modification No.:	085-16150-00002
Permit Reviewer:	Nysa L. James

The Office of Air Quality (OAQ) has reviewed a modification application from Da- Lite Screen Company, Inc. relating to the operation of a photographic equipment and supplies operation.

Explanation of Modification

On September 24, 2002, the OAQ received a request to modify the permit as follows:

Comment 1. The description of P2 and P3 under section D.2 of the permit should reference HVLP in addition to the other methods of application as listed in the permit.

Response 1: Since the current permit does not accurately reflect P2 and P3, the descriptions in Sections A.2 and D.2 are revised as follows:

One (1) Conveyorized Paint line consisting of three (3) Ranzburg spray booths, identified as P2 , coating metal parts, application methods are electrostatic disk, **HVLP** and electrostatic air atomized, with a maximum capacity of 1.2 units per hour, using dry filters as control, and exhausting at stacks S2, S3, S4, S5, S6, S7, S8, S9, S10, and S11, installed in 1968.

One (1) Cosmo/Model C booth, identified as P3, coating metal parts, using air atomization **or HVLP** application method, with a maximum capacity is 1.2 units per hour, using dry filters as control, and exhausting at stack S15, installed in 1968.
(Note: One paint booth with 2 spray guns; referred as the Cosmo/Model C booth).

Comment 2: The description of the maximum capacity in Section D.2 should be revised to reference the usage in gallons per minute instead of units per hour. Da-Lite does not have any production related activities which correspond to 1.2 units per hour and therefore the usage of 2.41 gallons per minute for P2 and 0.94 gallons per minute for P3 should be stated instead.

Response 2: Since the current permit does not accurately reflect the maximum usage of P2 and P3,

the descriptions in Sections A.2 and D.2 are revised as follows:

One (1) Conveyorized Paint line consisting of three (3) Ranzburg spray booths, identified as P2, coating metal parts, application methods are electrostatic disk, HVLP and electrostatic air atomized, with a maximum ~~capacity of 1.2 units per hour~~ **usage of 2.41 gallons per minute**, using dry filters as control, and exhausting at stacks S2, S3, S4, S5, S6, S7, S8, S9, S10, and S11, installed in 1968.

One (1) Cosmo/Model C booth, identified as P3, coating metal parts, using air atomization application method or HVLP, with a maximum ~~capacity is 1.2 units per hour~~ **usage of 0.94 gallons per minute**, using dry filters as control, and exhausting at stack S15, installed in 1968.

(Note: One paint booth with 2 spray guns; referred as the Cosmo/Model C booth).

Comment 3: Da-Lite does not understand the distinction between "observations and inspections". The source suggests that the language of D.2.4 just state weekly observations of the rooftops and nearby ground in lieu of daily inspections of the filters and weekly observations of the overspray.

Response 3: After discussions with the source on September 24, 2002, the OAQ has agreed to revise the type of compliance parameters which are required in order to insure compliance with 326 IAC 5 and 326 IAC 6. The OAQ has agreed to remove the current monitoring of the filters and overspray located under the Compliance Monitoring section located in D.2 and add an Operator Training Program under the Compliance Determination section located in D.2. Since the source operates several large surface coating operations, the OAQ feels that an Operator Training Program which includes training of the proper set-up and operation of the particulate control system and trouble shooting practices of the such control system is necessary. The revisions to D.2 are as follows:

Compliance Determination Requirements

D.2.3 Operator Training Program

- (a) **The Permittee shall demonstrate compliance with 326 IAC 6-3 by the implementation of an operator-training program as follows:**
 - (1) **All operators that perform surface coating operations using spray equipment or booth maintenance, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.**
 - (2) **Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.**
 - (3) **All operators shall be given refresher training annually.**
- (b) **Additional inspections and preventive measures shall be performed**

as prescribed in the Preventive Maintenance Plan.

D.2.4 Particulate [326 IAC 6-3-2(d)]

The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the Ranzburg spray booths and the Cosmo/Model C booth are in operation. The requirement to operate the control is not federally enforceable.

~~Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]~~

~~D.2.3 Particulate [326 IAC 6-3-2(d)]~~

~~The dry filters for particulate control shall be in operation at all times when the Ranzburg spray booths and the Cosmo/Model C booth are in operation. The requirement to operate the control is not federally enforceable.~~

~~D.2.4 Monitoring~~

-
- ~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the Ranzburg spray booths and Cosmo/Model C stacks (S2 through S11, and S15) while the respective booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to Take Response Steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~
-
- ~~(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to Take Response Steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~
-
- ~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.5 Record Keeping Requirements

-
- (a) To document compliance with Condition D.2.12 and D.2.34, **the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.** ~~the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 4: The description of P3a under section D.3 of the permit should reference HVLP in addition to the other methods of application as listed in the permit.

Response 4: Since the current permit does not accurately reflect P3a, the descriptions in Sections A.2 and D.3 are revised as follows:

Two (2) spray booths, East and West Hand Spray Booths, each with two spray guns, identified as P3a, coating metal parts, using ~~air atomization application~~ **HVLP** method, with a maximum ~~capacity of 1.2 units~~ **usage of 1.69 gallons per hour minute**, using dry filters as control, and exhausting at stacks S12, S13 and S14, installed in 1986.

Comment 5: Da-Lite does not understand the distinction between "observations and inspections". The source suggests that the language of D.3.5 just state weekly observations of the rooftops and nearby ground in lieu of daily inspections of the filters and weekly observations of the overspray.

Response 5: After discussions with the source on September 24, 2002, the OAQ has agreed to revise the type of compliance parameters which are required in order to insure compliance with 326 IAC 5 and 326 IAC 6. The OAQ has agreed to remove the current monitoring of the filters and overspray located under the Compliance Monitoring section located in D.3 and add an Operator Training Program under the Compliance Determination section located in D.3. Since the source operates several large surface coating operations, the OAQ feels that an Operator Training Program which includes training of the proper set-up and operation of the particulate control system and trouble shooting practices of the such control system is necessary. The revisions to D.3 are as follows:

Compliance Determination Requirements

D.3.4 Operator Training Program

- (a) **The Permittee shall demonstrate compliance with 326 IAC 6-3 by the implementation of an operator-training program as follows:**

 - (1) **All operators that perform surface coating operations using spray equipment or booth maintenance, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.**
 - (2) **Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.**
 - (3) **All operators shall be given refresher training annually.**
- (b) **Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.**

D.3.5 Particulate [326 IAC 6-3-2(d)]

The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the spray booths are in operation. The requirement to operate the control is not federally enforceable.

~~Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]~~

~~D.3.4 Particulate [326 IAC 6-3-2(d)]~~

~~The dry filters for particulate control shall be in operation at all times when the spray booths are in operation. The requirement to operate the control is not federally enforceable.~~

~~D.3.5 Monitoring~~

- ~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S12, S13 and S14) while the respective booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to Take Response Steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~
- ~~(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to Take Response Steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~
- ~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.6 Record Keeping Requirements

- (a) To document compliance with Condition D.3.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.2.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents
 - (2) A log of the dates of use

- (3) The volume weighted VOC content of the coatings used for each month
 - (4) The cleanup solvent usage for each month
 - (5) The total VOC usage for each month and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.3.13 and D.3.45, **the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.** ~~the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 6: The descriptions of the facilities located under section D.3 of the permit should reference HVLP in addition to the other methods of application as listed in the permit. In addition, the company submitted other minor description changes on September 24, 2002.

Response 6: Since the current permit does not accurately reflect the description of the units listed in D.3, this condition and the associated descriptions located in Section A.2 are revised as follows:

One (1) Screen Assembly West Spray Table 1 (ST₁), identified as P6, coating screen fabric, application method is ~~airless~~ **HVLP**, with a maximum capacity of 24 fabric screens per hour, using dry filters as control, and exhausting at stacks S20, S21, installed in 1968

One (1) Customs' ~~old~~ **West** Spray Table 3, (ST₃), identified as P6, coating screen fabric, application method is ~~airless~~ **HVLP**, with a maximum capacity of 12 fabric screens per hour, using dry filters as control, and exhausting at stacks, S22 and S23, Installed in 1968.

One (1) **East Tension Tab Screen Spray Table** ~~Paint-Edger Table~~, (ST₄), identified as P6, **application method is HVLP**, coating ~~audio/visual~~ fabric screens with a maximum capacity of 12 fabric screens per hour, equipped with a dry filter for particulate over spray control and exhausting to stacks S24 and S25, installed in 1996.
(Note: This is ST₄ shown in 1996 company application, and it's exhausts to stack S24 & S25 not S27 & S28 as shown in CP 085-6342.)

One (1) Custom East Spray Table, (ST₅) identified as P6, equipped with **HVLP** ~~an air atomization spray system~~, with a maximum capacity of 12 fabric screens per hour, using dry filters for particulate control and exhausting at stack identified as S40 and S41, installed 1997.

One (1) Screen Assembly East Spray Table 2, ST₂, identified as P6, equipped with **HVLP** ~~an air atomization spray application system~~, with a maximum capacity of 24 fabric screens per hour, using a dry filter for overspray control, and exhausting at stacks identified as S46 and S47. CP-085-9873-00002 was issued on October 23, 1998.

One (1) ~~Casino~~ **Screen Assembly Small** Spray Table, ST₆, identified as P6, equipped with **HVLP** ~~an air atomization spray application system~~, with a maximum capacity of 15

fabric screens per hour, using a dry filter for overspray control, and exhausting at stacks identified as S42 and S43. CP-085-9873-00002 was issued on October 23, 1998. (Note: ST₆, S42 and S43 were relocated in 2000)

One (1) West Tension Tab Screen Spray Table, ST₇, identified as P6, equipped with ~~HVLP air atomization spray application system~~, with a maximum capacity of 12 fabric screens per hour, using a dry filter for overspray control, and exhausting at stacks identified as S44 and S45. CP-085-9873-00002 was issued on October 23, 1998.

One (1) **New Tension Tab Screen Spray** ~~Paint Edge~~ Table (ST₈), identified as P6, with a maximum capacity of 12 fabric screens per hour, equipped with HVLP Spray Applicator and dry filters for particulate control and exhausting to stacks S50 and S51. SSM 085-12975-00002 was issued on March 15, 2001.

Comment 7: In order to clarify the intent of Condition D.4.1, the condition should be revised to read "...PM from each paint tables;..".

Response 7: The OAQ agrees. The condition is revised as follows:

D.4.1. Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52, Subpart P and CP 085-9873-0002 issued on October 23, 1998, the PM from **each of** the paint tables; ST₁, ST₂, ST₃, ST₄, ST₅, ST₆, ST₇, ST₈ and GLBD shall not exceed the pounds per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Comment 8: Da-Lite does not understand the distinction between "observations and inspections". The source suggests that the language of D.4.6 just state weekly observations of the rooftops and nearby ground in lieu of daily inspections of the filters and weekly observations of the overspray.

Response 8: After discussions with the source on September 24, 2002, the OAQ has agreed to revise the type of compliance parameters which are required in order to insure compliance with 326 IAC 5 and 326 IAC 6. The OAQ has agreed to remove the current monitoring of the filters and overspray located under the Compliance Monitoring section located in D.4 and add an Operator Training Program under the Compliance Determination section located in D.4. Since the source operates several large surface coating operations, the OAQ feels that an Operator Training Program which includes training of the proper set-up and operation of the particulate control system and trouble shooting practices of the such control system is necessary. The revisions to D.4 are as follows:

D.4.5 Operator Training Program

(a) The Permittee shall demonstrate compliance with 326 IAC 6-3 by the implementation of an operator-training program as follows:

- (1) All operators that perform surface coating operations using spray equipment or booth maintenance, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.**

- (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.
- (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.4.6 Particulate [326 IAC 6-3-2(d)]

The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when ST₁, ST₃, ST₄, ST₅, and ST₈, ST₂, ST₆, ST₇, and GLBD are in operation. The requirement to operate the control is not federally enforceable.

~~Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]~~

~~D.4.5 Particulate [326 IAC 6-3-2(d)]~~

- ~~(a) The dry filters for particulate control shall be in operation at all times when the paint tables; ST₁, ST₃, ST₄, ST₅, and ST₈ are in operation. The requirement to operate the control is not federally enforceable.~~
- ~~(b) Pursuant to CP 085-9873-00002, issued on October 23, 1998, the dry filters for particulate control shall be in operation at all times when the paint tables; ST₂, ST₆, ST₇, and GLBD are in operation.~~

~~D.4.6 Monitoring~~

- ~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the coating fabric operation stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to Take Response Steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~
- ~~(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to Take Response Steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~
- ~~(c) Additional inspections and preventive measures shall be performed as~~

~~prescribed in the Preventive Maintenance Plan.~~

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.2 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use
 - (3) The volume weighted VOC content of the coatings used for each month
 - (4) The cleanup solvent usage for each month
 - (5) The total VOC usage for each month and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.4.13 and D.4.56, **the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.** ~~the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 10: The description of P8 under section D.5 of the permit should reference HVLP and hand application in lieu of the other method of application listed in the permit. In addition, the capacity listed for P8 is not representative of the operation and should be changed to 1.41 gallons per minute.

Response 10: Since the current permit does not accurately reflect P8 , the descriptions in Sections A.2 and D.5 are revised as follows:

Four (4) spray booths consisting of one (1) black paint booth, one (1) south glue booth, one (1) north glue booth, and one (1) finish spray booth **and one (1) hand application operation**, identified as P8, coating wood furniture. Application methods are **HVLP and hand application** ~~airless~~, with a maximum **usage of 1.41 gallons per minute** ~~capacity of 1.2 AV Furniture units per hour~~, using dry filters as control and exhausting at stacks S31, S32, S33, S34, S35 and S36, installed in 1989.

(Note: two north and south glue booths are the contact cement booths.)

Comment 11: The description of P10 does not accurately reflect the facility. This facility uses latex paint which is applied to a roller and painted on boxes that are not furniture but rather a building or structural component. The boxes are usually encased within a ceiling or wall and are not visible. It is similar to a light fixture within a ceiling and is technically by definition not furniture. Da-Lite requests that the decision be changed and the citation of P10 under D.5.5 be removed.

Response: 11: After reviewing the actual operation of P10, the OAQ does agree with Da-Lite that the box shop does not coat wood furniture but in fact does coat boxes which are used for other purposes outside of the furniture manufacturing operation. Therefore, the descriptions located in A.2 and D.5 is revised and Condition D.5.5(a) is revised to remove the reference to P10.

The Box Shop Coating facilities identified as P10, coating ~~furniture; painting wood boxes of~~ and medium density fiberboard for ~~Da-Lite boxes with building or structural components, applied with~~ paint rollers using a water based paint, with a maximum ~~capacity of 4 units per hour~~ **usage of 0.1 gallons per minute** and exhausting at stack S38, installed prior to 1980.

D.5.5 Wood Furniture NESHAP [40 CFR 63, Subpart JJ] [326 IAC 20-14-1]

- (a) The wood furniture coating operations are subject to 40 CFR Part 63, subpart JJ, which is incorporated by reference as 326 IAC 20-14-1, with a compliance date of December 7, 1995. Therefore, the wood furniture coating operations, identified as P8 ~~and P10~~, shall comply with the following conditions:

Comment 12: Delete "prepare and" and delete the reference to 60 days after the compliance date. The compliance date is well past, the company is in compliance and maintaining the records.

Response 12: The OAQ agrees that the compliance date has passed and the source is maintaining records of their work practice implementation plan. Condition D.5.6 is revised as follows:

D.5.6 Work Practice Standards [40 CFR 63.803][326 IAC 20-14-1]

The Permittee of an affected source subject to this subpart shall **continue to** ~~prepare and~~ maintain a written work practice implementation plan ~~within sixty (60) calendar days after the compliance date~~. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

Comment 13: Da-Lite doe not understand the distinction between "observations and inspections". The

source suggests that the language of D.5.11 just state weekly observations of the rooftops and nearby ground in lieu of daily inspections of the filters and weekly observations of the overspray.

Response 13: After discussions with the source on September 24, 2002, the OAQ has agreed to revise the type of compliance parameters which are required in order to insure compliance with 326 IAC 5 and 326 IAC 6. The OAQ has agreed to remove the current monitoring of the filters and overspray located under the Compliance Monitoring section located in D.5 and add an Operator Training Program under the Compliance Determination section located in D.5. Since the source operates several large surface coating operations, the OAQ feels that an Operator Training Program which includes training of the proper set-up and operation of the particulate control system and trouble shooting practices of the such control system is necessary. The revisions to D.5 are as follows:

D.5.10 Operator Training Program

-
- (a) **The Permittee shall demonstrate compliance with 326 IAC 6-3 by the implementation of an operator-training program as follows:**
- (1) **All operators that perform surface coating operations using spray equipment or booth maintenance, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.**
 - (2) **Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.**
 - (3) **All operators shall be given refresher training annually.**
- (b) **Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.**

D.5.11 Particulate [326 IAC 6-3-2(d)]

The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the spray booths, identified as P8, are in operation. The requirement to operate the control is not federally enforceable.

~~Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]~~

~~D.5.10 Particulate [326 IAC 6-3-2(d)]~~

~~The dry filters for particulate control shall be in operation at all times when the spray booths, identified as P8, are in operation. The requirement to operate the control is not federally enforceable.~~

D.5.11 Monitoring

- (a) ~~Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S31 through S 36) while the respective booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to Take Response Steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~
- (b) ~~Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to Take Response Steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~
- (c) ~~Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

D.5.12 Record Keeping Requirements

- (d) ~~To document compliance with Condition D.5.17 and D.5.10, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan. the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~

Comment 14: The initial compliance certification has already been submitted. This is not an ongoing obligation and as such is not necessary. The source is past the dates refereed and has already complete such. Please delete D.5.12(b).

Response 14: The OAQ agrees. On February 18, 2000 , the source submitted the initial compliance certification. Therefore, the condition has been removed frm the permit.

Comment 15: The router listed in D.6 is not a CNC router. Please delete all references to CNC throughout this section fo the permit.

Response 15: The OAQ agrees. The description in Sections A.2 and D.6 is revised to delete the reference "CNC". Section D.6 and Conditions 6.1 and 6.3 are revised as follows:

One (1) ~~CNC~~ router with an internal bagfilter collector and no outside exhaust, install in 1968

D.6.1 Particulate Matter (PM) [40 CFR Part 52, Subpart P]

Pursuant to 40 CFR Part 52, Subpart P, the allowable PM emission rate from the woodworking facilities including ~~the CNC~~ router, shall not exceed 1.15 pounds per hour when operating at a process weight rate of 300 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.6.3 Particulate [326 IAC 6-3-2(d)]

The baghouse for particulate control shall be in operation and control emissions from the woodworking machines including ~~the CNC router~~ at all times that the woodworking machines are in operation. The requirement to operate the control is not federally enforceable.

Comment 16: Up to 14 woodworking machines tie into the referenced baghouse. The language should be revised to "woodworking machines' baghouse" so that the language does not infer one woodworking machine.

Response 16: The OAQ agrees. Condition D.6.4(a) is revised as follows:

D.6.4 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking machines's stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

The Table of Contents has been revised to account for this modification.

Justification for the Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(d) because the surface coating monitoring is being replaced with a operator training program condition. All of the other changes within this modification are administrative in nature.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 24 2002.

Conclusion

This permit modification shall be subject to the conditions of the attached **Part 70 Permit No. 085-16150-00002**.